

Fortinet Partner Ethics and Compliance

Fortinet is committed to being a good partner and is committed to the long-term success of its good partners. As Fortinet continues to grow to become the largest and best security company in the world, ensuring Fortinet maintains its reputation as a highly ethical business is critical. To have long-term success, it is essential that Fortinet and its partners maintain the highest level of ethics in business conduct. To assist partners in meeting their compliance obligations, below is a high level summary of some of those compliance requirements.

Compliance with Anti-Corruption Laws and Policies

It goes without saying that both partners and Fortinet should not engage in any bribery and should not provide **anything of value** in return for other partners or end-customers buying Fortinet products and services. In addition to cash and cash equivalents, improper items of value may include entertainment, meals, loans, giveaways, and paying for travel or other expenses, if provided in return for business. Gifts to government entities or affiliates are expressly prohibited. These anti-bribery policies are always important and are especially important given Fortinet is a U.S. headquartered company trading on NASDAQ, and as a result Fortinet and its partners must abide by the U.S. Foreign Corrupt Practices Act, or FCPA.

No Side Agreements

To be valid, all Fortinet commitments to partners and end-customers must be brought to the attention of Fortinet's Finance and Legal departments and approved by those teams in advance of the commitment. Prohibited and unenforceable side agreements include any commitments not authorized by Fortinet's Finance and Legal departments, and can include but are not limited to commitments related to: return rights, future discounts or pricing, roadmap or release date commitments, or any contingency. Commitments by Fortinet sales representatives that have not been approved in advance by Legal and Finance and signed by **Fortinet's General Counsel** will not bind Fortinet.

Export Compliance

Fortinet partners are responsible for following all export laws and regulations. These requirements may be particularly complex with high encryption products such as many security products. As one example, a partner may have an obligation to obtain a U.S. export license **prior to shipping** product to a government end-customer outside of the U.S. Any such license may take 60 – 90 days or longer to obtain and requires advance planning. Export license requirements apply to **stocking** orders as well. It is the partner's responsibility to obtain proper re-export licenses for stocking orders shipped to license-able end-users like certain government end-users. Also Fortinet products cannot be shipped to embargoed countries, including Iran, Syria, Cuba, North Korea, and Sudan. Please be mindful of diversion tactics, and do not engage in any activity that attempts to circumvent export control laws. Fortinet is prohibited from servicing, and will not service, any product exported in violation of export compliance requirements. It is important that Fortinet partners ensure they have proper controls in place to ensure compliance with U.S. export control laws.

No Unauthorized Disclosure or Use of Fortinet Confidential Information or Intellectual Property

Fortinet partners are responsible for protecting and keeping confidential Fortinet's confidential information and only use it as contemplated in the partner agreement. Partners and Fortinet employees also **may not give away any Fortinet intellectual**

property, such as support updates, except in limited circumstances such as where support is provided for free in connection with evaluation units pursuant to a contract approved by Fortinet's Finance and Legal departments.

No Conflicts of Interest

As just one clear example, Fortinet and partner employees may not participate in **improper payments**, including kickbacks or unauthorized profit sharing with partners. Fortinet employees should not benefit from personal ownership interest in partners or vendors or from outside employment by such partners or vendors. Also, partners should not provide items of value to Fortinet employees that are designed to influence the Fortinet employee possibly against the interest of Fortinet. As a general rule, Fortinet employees and partners should not engage in conduct that may give the appearance of creating an improper conflict of interest.

Each partner should have proper compliance policies in place and ensure that, in dealing with Fortinet employees and other partners and end-customers, the partner abides by its policies, for example, by obtaining proper approval for gifts, promotions, and incentive bonuses.

Compliance with Insider Trading Policies and Laws

Fortinet is a **publicly-traded company**. Under applicable laws, all Fortinet employees and partners are prohibited from trading stock while in possession of material, non-public information regarding Fortinet and from tipping or sharing material, non-public information with others.

Fortinet looks forward to a successful partnership and appreciates that its partners help to ensure ethical business practices and a culture of integrity. If you have any questions regarding Fortinet's policies, please feel free to contact Fortinet's Legal department at legal@fortinet.com.